

Magistrate Judge S. Kate Vaughan

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AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALYSHA JONES,

Defendant.

NO. CR20-092 JCC

MOTION FOR DETENTION

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156).
- ☐ Crime of Terrorism (18 U.S.C. § 2332b (g)(5)(B)) with a maximum sentence of ten years or more.
- ☐ Crime with a maximum sentence of life imprisonment or death.
- ☒ Drug offense with a maximum sentence of ten years or more.

- 1 ☐ Felony offense and defendant has two prior convictions in the four
 2 categories above, or two State convictions that would otherwise fall within
 3 these four categories if federal jurisdiction had existed.
- 4 ☐ Felony offense involving a minor victim other than a crime of violence.
- 5
- 6 ☐ Felony offense, other than a crime of violence, involving possession or use
 7 of a firearm, destructive device (as those terms are defined in 18 U.S.C. §
 8 921), or any other dangerous weapon.
- 9 ☐ Felony offense other than a crime of violence that involves a failure to
 10 register as a Sex Offender (18 U.S.C. § 2250).
- 11 ☒ Serious risk the defendant will flee.
- 12 ☒ Serious risk of obstruction of justice, including intimidation of a
 13 prospective witness or juror.

14 2. **Reason for Detention.** The Court should detain defendant because there
 15 are no conditions of release which will reasonably assure (check one or both):

- 16 ☒ Defendant's appearance as required.
- 17 ☒ Safety of any other person and the community.

18 3. **Rebuttable Presumption.** The United States will invoke the rebuttable
 19 presumption against defendant under § 3142(e). The presumption applies because:

- 20 ☐ Probable cause to believe defendant committed offense within five years of
 21 release following conviction for a qualifying offense committed while on
 22 pretrial release.
- 23 ☒ Probable cause to believe defendant committed drug offense with a
 24 maximum sentence of ten years or more.
- 25 ☐ Probable cause to believe defendant committed a violation of one of the
 26 following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or
 27 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).
 28

- ☐ Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. §§1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

- ☒ At the initial appearance
- ☐ After a continuance of ____ days (not more than 3)

DATED this 7th day of October, 2021.

Respectfully submitted,

BRIAN T. MORAN
United States Attorney



AMY JAQUETTE
Assistant United States Attorney